

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**CANAL INDEMNITY COMPANY,
A SOUTH CAROLINA CORPORATION,**

Plaintiff,

V.

Case No. 4:19-cv-2945

**COASTAL TRANSPORT CO., INC., A
TEXAS CORPORATION; CALJET II, LLC,
AN ARIZONA LIMITED LIABILITY
COMPANY; CALJET OF AMERICA, LLC,
AN ARIZONA LIMITED LIABILITY
COMPANY; CHEVRON U.S.A., INC., AN
PENNSYLVANIA CORPORATION;
VALERO MARKETING AND SUPPLY
COMPANY, A DELAWARE
CORPORATION; CIRCLE K TERMINAL,
LLC, A DELAWARE LIMITED LIABILITY
COMPANY; NATIONAL INTERSTATE
INSURANCE COMPANY, AN OHIO
CORPORATION; PHILLIPS66, A
DELAWARE CORPORATION; AND PRO-
PETROLEUM, INC., A TEXAS
CORPORATION,**

Defendants.

**DEFENDANT CHEVRON U.S.A. INC.'S UNOPPOSED MOTION TO EXTEND TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT FOR
DECLARATORY JUDGMENT**

TO THE HONORABLE COURT:

Defendant Chevron U.S.A. Inc. ("Chevron") hereby files this unopposed motion to extend time to answer or otherwise respond to Plaintiff Canal Indemnity Company's ("Canal") complaint for declaratory judgment and would show as follows:

1. Chevron was served with Canal's complaint on August 19, 2019, making its deadline to answer or respond to the complaint September 9, 2019.

2. By this motion, Chevron seeks an order extending the time for it to answer or respond to the complaint until October 8, 2019.

3. Chevron's counsel conferred with Canal's counsel about the requested extension and Canal's counsel does not oppose it.

Chevron therefore requests the Court enter an order extending the time for Chevron to answer or otherwise respond to Canal's complaint until October 8, 2019.

Respectfully submitted, this the 5th day of September, 2019.

CHEVRON U.S.A. INC.

By: /s/ Patrice Pujol
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*Application for admission forthcoming.

Counsel for Defendant Chevron U.S.A. Inc.

CERTIFICATE OF SERVICE

I do hereby certify that I have electronically served the foregoing motion using the Court's ECF system, which sent notification to all known counsel of record.

THIS, the 5th day of September, 2019.

/s/ Patrice Pujol
PATRICE PUJOL